

1
2 THE LAW OFFICES OF RANDOLPH H. GOLDBERG
3 RANDOLPH H. GOLDBERG, ESQ.
4 4000 S. Eastern Avenue
5 Suite 200
6 Las Vegas, Nevada 89119
7 (702) 735-1500
8 Attorney for Debtor
9 Nevada State Bar no. 5970

10
11 UNITED STATES BANKRUPTCY COURT

12 DISTRICT OF NEVADA

13 * * * * *

14 In re:)
15 VAN HUYNH) BANKRUPTCY NUMBER:
16) BK-S-09-30236-MKN
17) Chapter 13
18)
19 Debtor.)
20) Date: OST PENDING
21) Time: OST PENDING
22)

23 AMENDED EX PARTE MOTION FOR ORDER SHORTENING TIME

24 Comes now, the Debtor above-named, by and through his attorney,
25 Randolph H. Goldberg, Esq., and moves this Court for an Order Shortening
26 Time in which to hear the MOTION TO REINSTATE AUTOMATIC STAY
27 RE: SECURED CREDITOR WELLS FARGO TO PROHIBIT SALE, AND
TO REINSTATE AUTOMATIC STAY in this case.

28 This Motion is made and based upon the papers and pleadings on
29 file herein and upon the Affidavit of Randolph H. Goldberg, Esq. attached
30 hereto.

31 DATED this 25th day of FEBRUARY , 2011.

32 THE LAW OFFICE OF
33 RANDOLPH H. GOLDBERG, ESQ.

34 By /s/RANDOLPH H. GOLDBERG, ESQ. /s/_
35 RANDOLPH H. GOLDBERG, ESQ.
36 4000 S. EASTERN AVENUE, STE. 200
37 LAS VEGAS, NV 89119
Attorney for Debtor

AFFIDAVIT OF RANDOLPH H. GOLDBERG, ESQ.

STATE OF NEVADA)
 ss:
COUNTY OF CLARK)

RANDOLPH H. GOLDBERG, ESQ., being first duly sworn,
deposes and says:

1. That he is the attorney of record in the
above-captioned matter and is licensed to practice law in
the State of Nevada.

2. That he is competent to testify to the matters
related herein to the best of his own knowledge and
belief.

3. That your affiant believes this to be an
urgent matter in that the debtors' time frame in which to
file this Motion due to the fact that the creditor issued a
sale date on the residence can be set for anytime after
march 5, 2011.

Therefore, your affiant requests that the Court
enter its order shortening time in which to hear the
MOTION TO REINSTATE AUTOMATIC STAY RE: SECURED CREDITOR WELLS
FARGO TO PROHIBIT SALE, AND TO REINSTATE AUTOMATIC STAY.

/s/ Randolph Goldberg Esq.
RANDOLPH H. GOLDBERG, ESQ.

SWORN TO AND SUBSCRIBED BEFORE ME
this 25th day of February, 2011

/s/ Adam Parmelee _____

NOTARY PUBLIC in and for the
County of Clark, State of Nevada
My Commission expires April 21, 2012.